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April 11, 2025

Via ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2203
New York, New York 10007

Re: *Experience Hendrix, L.L.C., et al vs. Noel Redding Estate Ltd., et al*,
Case No. 22-cv-00443-RA

Dear Judge Abrams:

Pursuant to the Court's Order dated April 4, 2025 (Dkt. 55), the parties in the above-captioned action respectfully submit this joint letter as a status report on the English action.

Plaintiffs' Status Report

The proceedings in the High Court in England (Claim Number IL-2022-000013, the "English Claim") remain ongoing with a 10-day trial listed to be heard starting December 1, 2025.

Following a Court of Appeal's judgment, Sony UK is seeking to amend its Defence. The proposed amendments were provided to the Claimants on Friday, April 4, 2025. The parties to the English Claim are in discussions as to whether those amendments will be consented to, or will require Court approval, and the timing of any Amended Reply. As a result of the proposed amendments, Sony UK has also

The Honorable Ronnie Abrams

April 11, 2025

Page | 2

proposed a revised timetable for the English Claim to accommodate the above amendments to the pleadings. The proposed timetable remains subject to further discussion and agreement between the parties (or otherwise, Court approval). In any event, the next main stages are for the parties to exchange: (1) factual witness statements; and (2) expert reports on relevant New York Law issues, both of which are currently due on April 17, 2025, but revised deadlines are being discussed.

It is not anticipated that the amendments or proposed revised timetable will affect the trial proceeding starting on December 1, 2025. All of the merits of the sustained claims are still to be determined by the UK Trial Court. The Plaintiffs herein, different parties from the UK Action, still believe that ultimately this Court retains jurisdiction for the purpose of enforcing the underlying Releases and covenants not to sue and requests that the Stay remain in place.

Defendants' Status Report

We write on behalf of defendants Noel Redding Estate Ltd. ("Redding Estate") and Mitch Mitchell Estate Ltd. ("Mitchell Estate") in response to Your Honor's docket order dated April 4, 2025, to provide an update on the status of the UK proceedings.

On January 29, 2024, the High Court of Justice Business and Property Courts of England and Wales ruled in favor of Mitchell Estate and Redding Estate and against Sony Music Entertainment UK Limited ("Sony UK"), overruling Sony UK's motion to dismiss and sustaining their claims that: (1) they own a share of the sound recording copyrights in the three studio albums recorded by the Jimi Hendrix Experience, *Are you Experienced*, *Axis: Bold as Love*, and *Electric Ladyland*, and also own performers' property rights in the sound recordings; and (2) they are entitled to relief for infringement of those copyrights and performers' rights. Sony UK appealed that judgment to the Court of Appeal (Civil Division).

On February 6, 2025, the Court of Appeal affirmed the judgment of the High Court of Justice in all respects. All that remains of the UK proceeding is a trial on the merits of the claims by Mitchell Estate and Redding Estate against Sony UK. That trial is scheduled to begin on December 1, 2025.

The effect of any final determination in the UK Action on this action cannot be known until the conclusion of the trial in the UK. For that reason, Defendants agree that the Stay should remain in place.

The Honorable Ronnie Abrams

April 11, 2025

Page | 3

Both Counsel are available at Your Honor's convenience to answer any questions the Court may have.

Respectfully submitted,

Herbsman Hafer Weber & Frisch, LLP

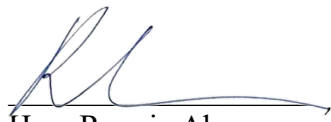
Wolf Haldenstein Adler Freeman & Herz LLP

By: s/Dorothy M. Weber
Dorothy M. Weber

By: s/ Mark C. Rifkin
Mark C. Rifkin

The Court thanks the parties for their status update. The case will remain stayed pending resolution of the English action. The parties shall submit another status update no later than January 1, 2026.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA' followed by a long horizontal flourish.

Hon. Ronnie Abrams

April 14, 2025